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August 12, 2022

VIA ECF FILING

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.
9/13/22

Re: *Comcast Cable Commc'ns, LLC v. Mission Broadcasting, Inc.*, Case No. 1:21-cv-06860

Dear Judge Koeltl:

Pursuant to Rule VI.A.2 of Your Honor's Individual Practices, Third-Party Defendant Mission Broadcasting, Inc. ("Mission") respectfully seeks leave to file its Reply in Support of Mission's Motion to Dismiss the Third-Party Complaint (the "Reply Brief") under seal.

On May 24, 2022, this Court entered an Order permanently sealing portions of Third-Party Plaintiff Comcast Cable Communications, LLC's ("Comcast") Third-Party Complaint that contain references to, and verbatim quotations from, a confidential Retransmission Consent Agreement between Mission and Comcast ("Mission-Comcast RCA"). See ECF No. 64. On June 17, 2022, and June 22, 2022, the Court granted Mission's subsequent motions to seal filings with additional references to and quotes from those now-permanently sealed allegations.

Consistent with the Court's Orders, Mission has redacted portions of the Reply Brief that correspond with the information that has been permanently sealed, and will file only the redacted version of these materials on the public docket. Mission thus hereby requests leave to file the unredacted Reply Brief under seal.

Mission seeks permanent seal of the redacted references to and quotations of the Mission-Comcast RCA and associated correspondence in the Reply Brief. The Reply Brief also contains other information that this Court permanently sealed, at the request of Nexstar Media Inc. ("Nexstar"), in connection with the Answer and Counterclaim and Third-Party Complaint. Regarding the Nexstar-specific material that has been redacted in the Reply Brief, Mission seeks temporary seal.

Mission has notified all counsel of record of its proposal. The parties have also conferred about these matters, and are all aware that if any party intends to request confidential treatment of the information, that party would be required to file, within three days, a letter motion to seal. Counsel for Nexstar and Comcast consent to Mission's proposed approach, and have not requested an advance opportunity to review Mission's proposed redactions. Accordingly, pursuant to Rule VI.A.2 of Your Honor's Individual Practices, Mission is contemporaneously submitting a redacted

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version of the Reply Brief on the public docket, as well as an unredacted version of the Reply Brief under seal.

We are available to provide any further information that may aid the Court in its determination of this matter.

Respectfully submitted,

/s/ Stephen Obermeier
Stephen J. Obermeier (*pro hac vice*)

Counsel for Mission Broadcasting, Inc.

cc: All counsel of record (via ECF)